

The Alabama Farmers Federation is pleased to offer its comment for the U.S. Department of Agriculture's draft National Animal Identification System (NAIS). As the largest general farm organization in Alabama with more than 460,000 members and representing sixteen different commodities, the Alabama Farmers Federation applauds USDA's efforts to develop a fully functional premises identification system and provide for its long-term maintenance and enhancement. The National Animal Identification System is the most important step that federal, state and industry officials can support in order to implement source verification for all species.

Alabama currently ranks third in broiler production and fourteenth in beef production nationally, and agriculture is currently the largest component of the state's economy. The Alabama Department of Agriculture and Industries has taken the lead in officially implementing procedures designed to register premises identification as part of the national ID system to protect animal and human health. The Department of Agriculture and Industries has a stated goal of working with USDA and the livestock industry in Alabama to establish a 48-hour trace-back system. While the Department is to be commended, this still can not be fully accomplished unless it is created in conjunction with a national framework established and operated by USDA. Only USDA has the resources necessary to ensure timely notification, testing of samples and providing the national component to this regulatory system.

USDA has worked with the industry and state regulatory agencies over the past two years to develop a comprehensive animal identification system. In its stated principles, USDA has identified three key components of: 1) premises registration; 2) animal identification; and 3) animal tracking. USDA can only achieve these goals ~~is~~ through a partnership with state and local officials and through industry's participation. USDA's stated timeline is that by January 2009 the reporting of defined animal species movements are required, and the entire program becomes mandatory for all animal species. The Alabama Farmers Federation supports this goal but urges USDA to implement the timeline more quickly. With adequate resources and cooperation from state regulatory agencies and industry stakeholders, this should be an achievable goal.

USDA and the Alabama Farmers Federation recognizes ~~that~~ there are several good policy reasons for making the NAIS mandatory, not the least of which is ensuring timely notification of a possible disease outbreak, uniformity, flexibility, inclusiveness that only a federal/state partnership can achieve and the ability to maintain a database of confidential information that is secured and reliable. And in order to achieve USDA's stated goal of accomplishing a 48-hour trace-back system, this can only be realistically accomplished through a mandatory system of participation. In addition, mandatory participation is the only way to achieve complete confidence in a regulatory system by both consumers and producers, domestic and foreign. This is vitally important given the recent report of another BSE-positive cow from Texas.

The Alabama Farmers Federation also recognizes that USDA supports several pilot programs that will allow a "transition" for the animal industry from a completely voluntary system to a mandatory one and supports this effort. One such effort is the

Alabama Beef Connection (ABC) which is a program that enables producers to obtain carcass data from animals that have been sold for slaughter. Although this effort is primarily focused on marketing, the animal ID tags that producers' utilize can be used for animal and premises identification, however it would not unduly inconvenience producers and would still maintain confidentiality of data. The ABC has tagged approximately 22,000 cattle from 2003 and currently is providing 2,000-3,000 tags per month. By 2007, ABC is scheduled to have tagged more than 40,000 cattle in Alabama. This also is being coordinated with the State Veterinarian to ensure a smooth transition with the state premises registration system. With continued federal funding, programs such as the ABC and other state and regional initiatives will enhance a timely transition to a mandatory system.

Some leaders in the industry have suggested a privately-held database could be more effective and efficient than one operated by a federal/state entity. The Alabama Farmers Federation believes that any system in which the industry would be relied upon to make notification to federal and state officials runs counter to USDA's goal of increasing industry and consumer confidence as well as ensuring animal and human health. The impartiality of a third-party regulatory system would be more likely to ensure this goal. In addition to BSE, state and federal regulatory officials require access to this database 24 hours a day in order to detect and track other diseases such as brucellosis, tuberculosis, and psuedorabies. It is more likely that providing this access by a private party would be more costly than a data base maintained by the federal government.